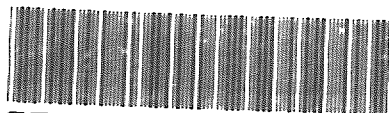


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**WASHINGTON**

1101 17th Street, N.W.

Suite 500

Washington, D.C. 20036

Telephone 202 223 4392

Fax 202 872 0745

E-mail: tsg@tsgusa.com

December 20, 1996

**OPPT Document Control Officer  
East Tower, Room G-99 [7407]  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460  
Attn: TSCA § 8(e) Coordinator**

Contains No CBI

Re: TSCA § 8(e) Report

**CALIFORNIA**

Dear Sir/Madame:

One Market Street Tower, 1600

San Francisco, CA 94105

Telephone 415 257 4120

Fax 415 544 7560

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 916 757 1298

Fax 916 757 1297

On behalf of Sumitomo Chemical Co. Ltd. (SCC), Technology Sciences Group Inc. (TSG) is submitting information concerning effects potentially related to handling of dyestuff chemicals pursuant to EPA's TSCA § 8(e) policy for substantial risk information.

SCC manufactures three substances (dyestuffs) in Japan that successfully completed EPA's PMN review process. Two of the substances are currently included in the non-confidential TSCA Inventory (ref. P-83-339 and P-83-341) and the third substance is included in the confidential TSCA Inventory (ref. P-94-1131). The specific chemical name for the non-confidential PMN substances and the generic name for the confidential substance are shown below.

**P-83-339**

1,5-Naphthalenedisulfonic acid, 2-[[8-[[4-chloro-6-[[3-[[2-(sulfoxy)ethyl]sulfonyl]phenyl]amino]-1,3,5-triazin-2-yl]amino]-1-hydroxy-3,6-disulfo-2-naphthanenyl]azo]-, pentasodium salt [CASRN 77365-64-1]

**P-83-341**

1,3,6-Naphthalenetrisulfonic acid, 7-[[2-[(aminocarbonyl)amino]-4-[[4-chloro-6-[[3-[[2-(sulfoxy)ethyl]sulfonyl]phenyl]amino]-1,3,5-triazin-2-yl]amino]phenyl]azol]-, tetrasodium salt [CASRN 80157-00-2]

**EUROPE**

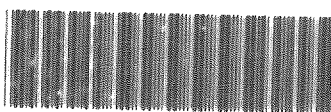
56, Rue des Colonies

Box 14

B-1000 Brussels, Belgium

Telephone 32 2 278 12 12

Fax 32 2 278 12 03



88970000089

P-94-1131

Naphthylazo-triazinylamino-naphthalene disulfonic acid [EPA Generic Name  
Accession Numbers 140331, 191094, and 210607].

SCC received information that some employees of a U.S. customer that purchased and handled the dyes experienced redness and skin irritation on their faces and arms, which may be an indication of a skin sensitization effect. SCC also was informed that the redness has been healing and is in a state of remission. SCC does not know which of the dyes may be responsible for these effects. The MSDS for one of the dyes (P-94-1131) indicates that one of its components showed positive results for skin sensitization in animal tests. SCC will be running skin sensitization studies on the other two dyes as well, and may modify the MSDSs for these dyes if warranted by the test results. If SCC obtains any additional information on the identify of the substance which many have cause the effects, they will provide it to you.

Very truly yours,

A handwritten signature in black ink that reads "Mark Scoville". The signature is written in a cursive, slightly slanted style.

Mark Scoville  
Director  
Chemicals Division

**Best Available Copy**